

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

KEVIN TAYLOR, :  
Plaintiff, :  
v. : C.A. No. 04-40163-PSB  
HARLEY LAPPEN, Director, :  
Federal Bureau of Prisons, et al., :  
Defendants. :

MOTION FOR APPOINTMENT OF COUNSEL

COMES NOW, the Plaintiff, Kevin Taylor, in Pro se and forma pauperis, and hereby files this motion for appointment of counsel pursuant to 18 U.S.C., section 3006A. In support of this motion, the Plaintiff respectfully submits the following:

1. On August, 2004, the Plaintiff Kevin Taylor filed in pro se a civil action complaint against the Happen Lappen, Director of the Federal Bureau of Prisons, and others staff of the Bureau of Prisons for various violations of his constitutional rights.

2. The Plaintiff complaint was docketed by the clerk of court but went unprocess(ed) for over eight moths before the Plaintiff was ordered to remit an affidavit and currect institution inmate account statement for the court to determine his forma pauperis status.

3. The Plaintiff complied with such ordered by submitting an affidavit with a copy of his account, filed with the United

States Marshals the amended complaint and service forms that were consequently sent to the defendants for a prompt response to the complaint.

4. Currently, the Plaintiff has not receive any further litigation pertaining to his complaint by the clerk of court, the Court, nor a response from the defendants.

5. The Plaintiff submits that the litigation of his law suit is extremely complicated for him because of the various rules, procedures and principles and standards of law that only a trained, skilled or license practitioner of law could possibly understand.

6. The Plaintiff further suggest that because of the importance of this litigation which involved several constitutional violations that the appointment of counsel is necessary to ensure justice is served, but also to fairly resolve the constitutional violations.

7. The Plaintiff moreover points out that counsel should be appointed since he cannot afford counsel to protect his rights, which another court in this district has appointed counsel in a similar case at Barrera v. Winn, Et. Al, C.A. No. 05-40107.

8. In addition, counsel should be appointed to resolve the complaint since only a skilled counsel can adequately address the court on this matter, besides ensure the Plaintiff's claims are properly represented and resolved.

WHEREFORE, for the foregoing reasons, the Plaintiff respectfully request this Honorable Court grant the appointment of counsel.

Respectfully submitted,



Dated: August 15, 2005.

KEVIN TAYLOR, Plaintiff, Pro se  
Reg. No. 03421-068  
Federal Medical Center-Devens  
P. O. Box 879  
Ayer, MA 01432

Certificate of Service

I hereby certify that a true and correct copy the foregoing motion for appointment of counsel was served by first class, United States Mail on the 15th day of August, 2005, upon the following:

United States Attorney  
United States Courthouse  
1 Courthouse Way, Suite 9200  
Boston, MA 02210

  
KEVIN TAYLOR